

UNITED STATES OF AMERICA
DISTRICT OF MASSACHUSETTS

UNITED STATES) CRIMINAL NO. 12-10080 (GAO)
v.)
)
LINDA CULKIN.)

ASSENTED MOTION TO ADJOURN SENTENCING TWO-WEEKS

NOW COMES the Defendant, Linda Culkin, in the above-captioned matter and respectfully moves this Honorable Court, through her court appointed attorney Inga L. Parsons, for two additional weeks for her sentencing, with the consent of the government, by Scott Garland, and the probation department, by Chrissy Murphy.

In support of this motion, counsel avers as follows:

1. Counsel has been out of her office since March 14, 2014, the date that the PSR was submitted and is not expected back until April 3, 2014.
2. It has been difficult for counsel to discuss the PSR with her client over the phone who does not physically have a copy due to the fact that she was moved to the Framingham facility and they do not permit PSRs to be sent to the facility.
3. Moreover, due to scheduling conflicts and a new counselor, counsel has had difficulty arranging for telephone time.
4. When counsel returns she has another matter that has arisen that requires immediate attention and will make it impossible to visit Ms. Culkin in Framingham until the following week.
5. Counsel's preference is to meet with Ms. Culkin in person and have sufficient time to provide the defense's response to the PSR in a timely matter.

6. Counsel has been in touch with the probation officer who would find it helpful to have additional time to complete the home visit in this matter and has no objection to a two week continuance.
7. The government, by AUSA Scott Garland has no objection to this request.
8. For other good and just cause.

Respectfully submitted,

/s/ Inga L. Parsons

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CERTIFICATE OF SERVICE

I, INGA L. PARSONS, hereby certify that on March 26 2014, I electronically served a copy of the foregoing document on the all registered participants of the CM/ECF System on the above-captioned matter and email a copy to :

/s/ Inga L. Parsons

INGA L. PARSONS
Attorney for *Linda Culkin*